

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TROY KARPOVICH, as guardian of
MICHAEL R. KARPOVICH, a legally-
incapacitated person,

Plaintiff,

CaseNo. 2:18-cv-12247-SFC-DRG

Honorable Sean F. Cox

v.

CITY OF DETROIT, a municipal corporation,
JAMES E. CRAIG, in his official capacity,
DETROIT BOARD OF POLICE COMMISSIONERS,
TIMOTHY L. LEACH, FREDERICK E.
PERSON, DETROIT POLICE OFFICERS
JOHN DOES 1 – 5, in their individual and
official capacities, TIMOTHY L. LEACH
d/b/a T. LEACH ENTERPRISE, and
EIGHTH STREET VENTURES, LLC,
d/b/a Ottawa Via,

Defendants.

**Defendants City of Detroit, James Craig, in his official capacity and
Detroit Board of Police Commissioners Response to Plaintiff's Motion
to Compel**

The attorney for the above named defendants and the attorney for the plaintiff have met and conferred concerning the various issues raised by plaintiff in this motion to compel and concerning the defendant's previous responses to the plaintiff's request for documents.

Defendants continue to assemble the requested documents and post them to the www.box.com electronic access point, entitled Karpovich v. Detroit et. al., Discovery Documents. Once the assembly is reasonably complete defendants will also supplement the prior written responses so that the assembled documents can be understood and reviewed.

This incident was comprehensively investigated and the documents and related materials are extensive. Moreover, there is still a criminal proceeding against the two officer defendants which is pending separately. Consequently this a difficult and time consuming process and will require some patience even with the existing co-operation between the parties.

Respectfully submitted,

/s/Edward V. Keelean (P29131)
Attorney for Defendants
City of Detroit Law Department
2 Woodward Avenue, Suite 500
Detroit, MI 48226
(313) 237-3059
KeelE@detroitmi.gov

Dated: May 14, 2019

Proof of Service

I hereby certify that on May 15, 2019, I electronically filed the foregoing pleading with the Clerk of the Court using the courts electronic filing system which will send notification of such filing to counsel of record.

/s/ Edward V. Keelean